

Eisenberg & Baum, LLP
Michael S. Quinn
24 Union Square East, Fourth Floor
New York, New York 10003
(212) 353-8700

Hearing Date: 9/30/2020
Objection Deadline: 9/23/2020

Counsel to the Ad Hoc Committee on
Accountability

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In Re:

PURDUE PHARMA L.P., *et al.*¹

Debtors.

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**THE AD HOC COMMITTEE ON ACCOUNTABILITY'S
OBJECTION TO DEBTOR'S MOTION AUTHORIZING
IMPLEMENTATION OF A KEY EMPLOYEE INCENTIVE PLAN
AND KEY EMPLOYEE RETENTION PLAN**

The Ad Hoc Committee on Accountability, by its undersigned counsel, objects to Purdue Pharma L.P.'s Motion for Entry of an Order Authorizing Implementation of a Key Employee Incentive Plan and a Key Employee Retention Plan. [Docket No. 1674] for the reasons set forth in the accompanying Memorandum of Points and Authorities.

¹ The debtors in these chapter 11 cases ("Debtors" or "Purdue"), along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014) (collectively, the "Bankruptcy Cases").

Dated: September 22, 2020
New York, NY

Respectfully Submitted,

Eisenberg & Baum, LLP

By: /s/ Michael S. Quinn
Michael S. Quinn (mq-1640)
24 Union Square East, Fourth Floor
New York, New York 10003
(212) 353-8700
mquinn@eandblaw.com
prachmuth@eandblaw.com
ebaum@eandblaw.com

Counsel to Ad Hoc Committee on Accountability